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11 CHICAGO TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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15 **UNITED STATES DISTRICT COURT**  
16  
17 **DISTRICT OF NEVADA**

18  
19 HSBC BANK, USA, NATIONAL  
ASSOCIATION, AS TRUSTEE FOR  
20 MORTGAGE PASS-THROUGH  
CERTIFICATES, MLMI SERIES 2006-A4,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,  
24 INC., et al.,

25 Defendants.

26 Case No.: 2:21-cv-00195-RFB-DJA

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28 **STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 9] AND MOTION FOR FEES AND  
COSTS [ECF No. 10]**

**(Second Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff HSBC Bank USA, National Association, as Trustee for Mortgage Pass-Through Certificates, MLMI Series 2006-A4 (“HSBC Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 3, 2021, HSBC Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-828889-C [ECF No. 1-1];
2. On February 3, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On March 5, 2021, HSBC Bank filed a Motion for Remand [ECF No. 9];
4. On March 5, 2021, HSBC Bank filed a Motion for Costs and Fees [ECF No. 10];
5. Chicago Title’s original deadline to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees was March 19, 2021;
6. On March 17, 2021, Chicago Title filed a Stipulation and Order requesting until April 2, 2021 to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees.
7. On March 25, 2021, the Court granted Chicago Title’s request and Chicago Title’s response to HSBC Bank’s Motion for Remand and Motion for Costs and Fees is currently due on April 2, 2021.
8. Chicago Title’s counsel is requesting an extension until April 9, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
9. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in HSBC Bank’s motions;
10. HSBC Bank does not oppose the requested extension;
11. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to HSBC Bank's  
2 Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended  
3 through and including April 9, 2021.

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5           Dated: April 2, 2021

6           EARLY SULLIVAN WRIGHT  
7           GIZER & MCRAE LLP

8           By: /s/-- Sophia S. Lau  
9           SCOTT E. GIZER  
10           SOPHIA S. LAU  
11           Attorneys for Defendant CHICAGO TITLE  
12           INSURANCE COMPANY

13

14           Dated: April 2, 2021

15           SINCLAIR BRAUN LLP

16           By: /s/-Kevin S. Sinclair  
17           KEVIN S. SINCLAIR  
18           Attorneys for Defendant CHICAGO TITLE  
19           INSURANCE COMPANY

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21           Dated: April 2, 2021

22           WRIGHT FINLAY & ZAK, LLP

23           By: /s/-Lindsay D. Robbins  
24           LINDSAY D. ROBBINS  
25           Attorneys for Plaintiff HSBC BANK, U.S.A.,  
26           N.A.

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28           **IT IS SO ORDERED:**

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30           Dated: April 5, 2021.



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**RICHARD E. BOULWARE, II**  
32           United States District Court

**CERTIFICATE OF SERVICE**

I hereby certify that on April 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ D'Metria Bolden  
D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP